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**BEFORE THE ARIZONA CORPORATION COMMISSION**

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AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST'S NOTICE OF FILING QUARTERLY STATUS REPORT ON THE SATE  
RECOMMENDATIONS**

Qwest Corporation ("Qwest") hereby provides notice of filing the attached Quarterly Status Report on the SATE Recommendations. Qwest hereby files said SATE status report as requested in the Arizona Corporation Commission (the "Commission" or "ACC") Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements – Operational Support System Requirements, dated May 1, 2002 (Staff's Recommendation Report"). In Qwest's filed comments, Qwest committed to providing quarterly reports beginning June 30, 2002 to address the status of the recommendations.

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Arizona Corporation Commission

**DOCKETED**

**JUN 27 2002**

DOCKETED BY	
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Dated this 27th day of June, 2002.

Respectfully submitted,

QWEST CORPORATION

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

**WILLIAM A. MUNDELL  
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JIM IRVIN  
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**IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.**

**DOCKET NO. T-00000A-97-0238**

**QWEST CORPORATION'S QUARTERLY STATUS REPORT ON THE SATE  
RECOMMENDATIONS**



Qwest Corporation ("Qwest") hereby submits this SATE status report as requested in the Arizona Corporation Commission (the "Commission" or "ACC") Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Operational Support System Requirements, dated May 1, 2002 (Staff's "Recommendation Report").

## **I. INTRODUCTION**

Staff's "Recommendation Report" includes a SATE recommendation that "Qwest should be required to report to the Commission on a quarterly basis, the status on its progress in implementing the recommendations of Staff and HP".<sup>1</sup> In Qwest's filed comments, Qwest committed to providing quarterly reports beginning on June 30, 2002 to address the status of the recommendations.<sup>2</sup>

HP submitted nine recommendations in its SATE Summary Evaluation Report and four recommendations in its SATE New Release Test Summary Report. Staff submitted three additional SATE recommendations.

Qwest has fully implemented or otherwise addressed all but two of the recommendations. The remaining recommendations relate to finalizing the PO-19 PID, which is still being negotiated between Qwest and the CLECs. Qwest fully expects these recommendations to be met by mid-July.

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<sup>1</sup> Staff's Supplemental Report on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Change Management Process and Stand-Alone Test Environment (Staff's "Supplemental CMP/SATE Report") at ¶106.

<sup>2</sup> Qwest Corporation's Comments Regarding CGE&Y's Final Report of the Qwest OSS Test and Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item NO. 2 Operation Support System Requirements; Section 5c.

This serves as the first quarterly report and provides a detailed status on each of the recommendations provided by HP in its SATE Summary Evaluation Report and its subsequent SATE New Release Test Summary Report, and by Staff in its Recommendation Report.

## II. STATUS OF RECOMMENDATIONS

### A. RECOMMENDATIONS FROM HP'S SATE SUMMARY EVALUATION REPORT

1. **Recommendation 1: HP recommends that Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.**

The plan and process by which SATE is updated with new products to meet CLEC needs are detailed in Qwest's CMP Change Request (CR) prioritization process. Like any other CMP CRs, SATE CRs for additional products can be submitted and prioritized. The Qwest Wholesale Change Management Process Document defines the CR creation and prioritization process, and states in the Prioritization section that "each OSS Interface *and Test Environment* release is prioritized separately."<sup>3</sup> Qwest's EDI Implementation Guidelines state "...additional functionality can be agreed upon and added in later releases. Request for transactions not currently supported may be requested via CMP".<sup>4</sup>

This process is currently being utilized. On March 25, 2002, Qwest distributed a CR prioritization form to the CLECs through CMP to prioritize all IMA products that SATE does not currently support. On March 28, 2002, the CLECs returned the

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<sup>3</sup> Qwest Wholesale Change Management Process Document, section 10.0 - <http://www.qwest.com/wholesale/cmp/whatiscmp.html> (italics added for emphasis)

<sup>4</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) – <http://www.qwest.com/wholesale/ima/edi/document.html>

completed forms, and on April 1, 2002, Qwest published the prioritization results. Two products, Facility Based Directory Listing and EEL, were prioritized at third and fifth, respectively, and are now candidates for Release 11.0. The CLECs prioritized all remaining products near the bottom of the list. Consequently, these will be prioritized for future releases.

Qwest's CMP process defines the plan Qwest and the CLECs follow to ensure SATE is updated to meet CLECs needs for testing. This recommendation has been met.

**2. Recommendation 2: HP recommends that Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.**

On January 15, 2002, in response to this recommendation, Qwest externally published the guidelines that detail the release management, version control, and quality assurance processes that Qwest employs for the issuance of SATE documents. These guidelines are available on the Qwest Wholesale web site.<sup>5</sup>

Qwest's current documentation processes support the production of documents that enable CLECs to properly utilize SATE. This recommendation has been met.

**3. Recommendation 3: To ensure continued adequacy of the SATE, HP recommends:**

- That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined
- That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the

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<sup>5</sup> <http://www.uswest.com/wholesale/ima/edi/document.html>

SATE process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the SATE should be encouraged to accomplish these goals and objectives

- That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE

In response to the first two bullet points, Qwest developed a staffing plan that details Qwest's CLEC testing organizational structure and the roles and responsibilities of all resources that directly support the organization. Additionally, this documentation includes objectives of the organization and the processes in place to ensure accountability. This plan is maintained as part of Qwest's IMA EDI Implementation Guidelines,<sup>6</sup> and was initially published with version 9.0 of the guide, released on January 21, 2002.

To address the third bullet point, Qwest developed the process flow documentation as recommended by HP. This information is maintained as part of Qwest's IMA EDI Implementation Guidelines document,<sup>7</sup> and was initially published with version 9.0 of the guide, released on January 21, 2002.

This recommendation has been met.

**4. Recommendation 4: HP recommends that Qwest publish a list of variances between SATE and production business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop their business processes in this**

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<sup>6</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

<sup>7</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

**'simulated' environment. This list should become a permanent part of the SATE documentation library.**

Qwest initially implemented this recommendation through SATE Release 9.0 and sent the variance documents to the CLECs via email using the EDI distribution list.

Qwest initially published four documents for IMA and SATE. These documents include:

- IMA BPL Errors List: a list of all IMA system generated errors. This has been published per release dating back to at least the 5.0 release.
- IMA Legacy System Errors List: This list was generated in January 2002 by querying the production logs for all legacy system error messages seen for the prior six months.
- SATE Legacy System Errors List: This list was published in January 2002 to include all legacy system errors that have been coded into SATE.
- IMA and SATE Legacy System Variance List: This list was published in January 2002 to provide the variance between the legacy system error messages coded into production and those coded into SATE.

In February 2002, the IMA Legacy System Errors List, the SATE Legacy System Errors List, and the IMA and SATE Legacy System Variance List were combined into a single document. The IMA BPL Errors List remained as a separate document for CLEC convenience due to the large size of the document.

Beginning with Release 10.0 and with every new release of IMA, Qwest will run scripts against the production logs of the previous IMA release. The purpose of this exercise is to gather the list of legacy system error messages encountered by the CLECs from the time the previous release was implemented until the time the new release is implemented. Each time this list is generated, Qwest will then evaluate it against SATE, and establish an updated list of variances.

Additionally, Qwest added the IMA BPL errors list into the single document for the other errors, and now one single variance list is published and available on the Qwest Wholesale web site as of May 23, 2002.<sup>8</sup> The variance list for Release 10.0 was published and posted to the web on June 17, 2002.

Qwest has a process in place to update and publish the errors list on an ongoing basis based on its implementation of this recommendation. This recommendation has been met.

- 5. Recommendation 5: HP recommends that Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECs to determine the full suite of products that shall be included in the SATE.**

SATE is formally incorporated into the CMP process as discussed in Recommendation 1 above. Qwest began the CLEC SATE Users' Group in early November 2001, as part of the CMP process. The purpose of this group is to provide Qwest the opportunity to communicate current plans for the testing environments, to allow CLECs the opportunity to communicate their testing needs, and to jointly present CRs to CMP to ensure that enhancements to Qwest environments meet the CLECs' stated needs.

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<sup>8</sup> <http://www.qwest.com/wholesale/ima/edi/document.html>

This user group has met 11 times thus far, beginning with the November 6, 2001, kickoff meeting. To further incorporate SATE into CMP, Qwest's monthly CMP agenda includes a standing entry for SATE discussion. This agenda entry includes discussions on the status of SATE enhancements, SATE CRs, and CLEC feedback. The inclusion of this agenda item began with the January 17, 2002 CMP meeting.

The proactive incorporation of SATE into the CMP process is consistent with the support of IMA, which will ensure that SATE remains adequate to meet the needs of Arizona CLECs and their future testing requirements. This recommendation has been met.

**6. Recommendation 6: HP recommends that Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.**

Qwest has a formal process by which the SATE will be available for new release testing on an ongoing basis. This process states: "Beginning with release 9.0, new releases of IMA are planned for release on the IMA EDI Stand-Alone Test Environment approximately thirty calendar days prior to their release in production unless that release is deemed to be in 'red testing status'. Red Testing Status indicates that the IMA release's system testing effort has discovered significant issues that place the release in jeopardy".<sup>9</sup>

Based on the process stated above, IMA EDI Release 9.0 was implemented in SATE on January 27, 2002, and in production on February 25, 2002. Qwest also notes that on October 22, 2001, IMA EDI Release 8.01 was released in SATE 27 days prior to the associated IMA production release. Continuing Qwest's commitment to make SATE

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<sup>9</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

available for new release testing, IMA EDI Release 10.0 was available in SATE on May 20, 2002 and placed in production on June 17, 2002. With the deployment of a new release into SATE approximately 30 days prior to production, Qwest has demonstrated that it has an existing formal process by which SATE is available to CLECs for new release testing going forward.

Qwest has appropriate processes in place to continue making SATE available for new release testing. This recommendation has been met.

**7. Recommendation 7: To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002.**

Based on this recommendation, HP was asked by the ACC to perform full release testing against SATE 9.0. After completing this second evaluation in March 2002, HP concluded, "the Qwest SATE is adequate to support New Release Testing by a CLEC."<sup>10</sup>

This recommendation has been met.

**8. Recommendation 8: HP recommends that a SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to consider the nature and volume of transactions that are executed in production.**

At the time this recommendation was made, Qwest had already proposed a measurement that subsequently was adopted by the Arizona TAG, satisfying this recommendation.

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<sup>10</sup> HP SATE New Release Test Summary Report, section 2.1.



Qwest developed a SATE performance measure, PO-19 – Stand-Alone Test Environment (SATE) Accuracy.<sup>11</sup> The language of this measure has been agreed and its purpose is to “evaluate Qwest’s ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment.”<sup>12</sup>

The Arizona SATE PID was developed by consensus with the CLEC’s. However, the standard for this measure was not determined until later, and was set at 95%. Qwest began reporting this measure with November 2001 results in the December 2001 reports.

Additionally, based on further CLEC input, Qwest has proposed a modification to PO-19, which includes a new sub-measure to execute the same transactions in production and in SATE, to further measure the extent to which SATE mirrors production. This modification is currently under discussion in Arizona and Qwest has committed to publishing results for the updated PID beginning with July data.

**9. Recommendation 9: HP recommends that Qwest file with the ACC an implementation plan for the above recommendations, which includes specific deliverables, milestones, and dates, no later than December 31, 2001.**

Qwest filed an implementation plan on December 28, 2001, in response to this recommendation to address the eight prior recommendations as presented by HP. As the above responses to the recommendations indicate, Qwest has addressed or is addressing all of the recommendations presented by HP.

This recommendation has been met.

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<sup>11</sup> Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

<sup>12</sup> Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

**B. RECOMMENDATIONS FROM HP'S SATE NEW RELEASE TEST SUMMARY REPORT**

- 1. Recommendation 1: All issues that have a status of "Closed-Unresolved" or "Open" as of the distribution of this document be incorporated into the SATE User Group and CMP process.**

HP has successfully closed all SATE issues. Only one issue remains in 'closed-unresolved' status, HPSATEEV2032. HP discovered an issue with an error message returned for a Facility Availability Query. The error message returned did not match the expected error as defined in the Data Document. Qwest modified SATE to correct this after HP's re-testing was complete. Consequently, HP believes this issue should remain closed-unresolved, but it indicates in the Issue response that it "doesn't feel that the resolution of this issue will significantly impact the findings of the transactional test results."<sup>13</sup> SATE has been corrected and there is no longer a mismatch between the Data Document and the actual error message returned. Therefore, this issue has been closed.

This issue is not a candidate for discussion at the SATE Users' Forum and/or in the monthly CMP meeting because it relates to a specific error message that has been corrected in 9.0 and forward.

- 2. Recommendation 2: Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.**

With the proposed updates to PO-19 to include a sub-measure to further measure production likeness, Qwest has submitted a revised PID to the Arizona TAG. As is standard with all proposed PID changes, the TAG members will collaboratively review and approve the proposed language, which will include the agreed-upon level of detail

concerning the calculations and measurement process. This recommendation will be met once the updated PO-19 PID is agreed by Qwest and the CLECs.

**3. Recommendation 3: Qwest should consider asking CLECs to submit data requests for negative scenarios and BPL edits for key transactions. Qwest provide a clearly defined process to ensure timely resolution of production mirror issues encountered by CLECs during post SATE certification.**

In its comments on CGE&Y's Final Report and Staff's Final and Supplemental Reports, dated May 17, 2002, Qwest agreed to add this topic to the next SATE Users' Group agenda for May 21, 2002. This action was to solicit feedback from the CLECs concerning their needs for negative testing of BPL edits and to include negative scenarios testing consistent with the CLEC needs expressed at the Users' Group meeting.

Qwest discussed negative testing with the CLECs in attendance at the May 21, 2002 SATE Users' Group. CLECs decided that specific error responses should not be required testing. Reasons for the decision are as follows:

- Currently, Qwest requires negative testing. Specifically, CLECs must test the ability to receive a reject response for each pre-order query, and for both ISC and BPL rejects on order transactions. Exact errors received can be any valid Qwest Legacy System error;
- Adding more negative testing scenarios to the Data Document would obligate CLECs to test for specific errors and add to the work effort to test new releases;
- Currently, CLECs may test additional, specific negative responses by using the data request process. Qwest would provide the data necessary to receive the desired error. Hence, CLECs already have the option of performing more negative testing should they choose to do so; and
- Current testing requirements do not enlarge testing work efforts and still afford CLECs the opportunity to do additional negative testing.

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<sup>13</sup> HPSATEEV2032.

In this discussion, it was clear that CLECs did not want additional negative testing scenarios added to the Data Document.

Additionally, HP recommended that Qwest provide a clearly defined process for production mirror issues encountered by CLECs after SATE certification. Qwest already has the process in place. It is the CMP production support process.<sup>14</sup> Section 12.2 of the CMP document states: "Problems encountered by the CLEC should be reported to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest."<sup>15</sup> This process applies to both production releases and SATE.

This recommendation has been met.

**4. Recommendation 4: Qwest include scenarios in Data Document reflecting all business rule changes identified in the New Release change summary documentation.**

Qwest proposed to implement this recommendation based upon the candidates for a release, instead of each individual change in the change summary. The candidates for a release encompass all of the major changes. Once the release candidate list is available for the upcoming release, Qwest will provide this list to the CLECs through CMP. In the Data Document for the new release, Qwest will identify which associated existing test scenario will appropriately test each SATE release candidate. In the cases where a new candidate does not yet have an associated SATE test transaction, Qwest will create a new transaction and provide that information to the CLECs as well. Any new transaction will

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<sup>14</sup> <http://www.qwest.com/wholesale/cmp/redesign.html>

<sup>15</sup> Wholesale CMP, section 12.0, which can be found at the following URL:  
<http://www.qwest.com/wholesale/cmp/whatiscmp.html>

be included in the new section of the Data Document. CLECs can elect to run these transactions to complete their re-certification testing requirements. If they do not plan to use the new functionality provided by a candidate, CLECs can use the existing transaction for the product and activity. The candidate review section of the Data Document will be specific to a release of the document.

This approach will allow CLECs to test the major changes in a release without the burden of processing through the many individual changes that each candidate causes. The appropriate associated SATE transaction(s), new or existing, will be identified to test the changes for a release, referenced in the Data Document, and made available for re-certification testing.

To ensure that this proposal provides the CLECs the greatest value in providing test scenarios for a new release, Qwest presented the proposal in the May 21, 2002 SATE Users' Group meeting for CLEC input. In this meeting, the CLECs agreed that this approach was appropriate. In addition, in response to a CLEC request during the meeting, Qwest published the new section of the Data Document for 10.0 ahead of the normal Data Document publication cycle on June 3, 2002. This was added to the Data Document with the June 14, 2002 publication.

This recommendation has been met.

**C. STAFF RECOMMENDATIONS**

- 1. Recommendation 1: Qwest should be required to immediately enhance the range of capabilities available in SATE to provide for negative testing by CLECs**

As detailed in Qwest's response to HP's Recommendation #3 above, Qwest discussed this topic in the May 21, 2002 SATE Users' Group meeting to solicit feedback

from the CLECs concerning their needs for negative testing of BPL edits. CLECs indicated that they require no additional negative testing. This recommendation has been met based on the input of CLECs utilizing SATE.

- 2. Recommendation 2: Qwest should be required to demonstrate by the time the Commission rules on SATE's adequacy, that it has incorporated all error codes and variances that exist between SATE and production into a single report as originally requested by HP.**

Qwest has published one single list on the Wholesale website, effective May 23, 2002. Additionally, the 10.0 single variance list was published to the Qwest website on June 17, 2002.<sup>16</sup>

This recommendation has been met.

- 3. Recommendation 3: Qwest should be required to report to the Commission on a quarterly basis, the status of its progress in implementing the recommendations of Staff and HP.**

This report serves as the first status report to the Commission concerning the status of progress on these recommendations. Qwest will continue to file quarterly reports on in-progress recommendations.

#### **D. CONCLUSION**

As detailed in this report, all but two of the recommendations are fully implemented. The remaining two recommendations are near completion in a collaborative effort with the CLECs, and an updated status will be reported in the next quarterly report, which will be provided no later than September 27, 2002.

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<sup>16</sup> <http://www.qwest.com/wholesale/ima/edi/document.html>